

STATE OF SOUTH CAROLINA

(Caption of Case)

Request for Certification of the Use of Universal Service Funds Pursuant to 47 C.F.R. 54.314 and Telecommunications Act Section 254(e), Federal Communications Commission CC Docket No. 96-45 (2017)(Form 481); and Annual Reports for ETC

201113
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BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET/NDI
NUMBER:

2014-43-0 555
2017 - 14 - C

Form

(Please type or print)

Submitted by: John Pringle

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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JUN 26 2017

CHANDLER

**BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2017-14-C

**ASSURANCE WIRELESS' ANNUAL
ELIGIBLE TELECOMMUNICATIONS CARRIER REPORT**

June 29, 2017

I. INTRODUCTION

Assurance Wireless of South Carolina, LLC (“Assurance Wireless” or “Company”) submits this Annual Report, pursuant to Order No. 2011-76, and respectfully requests the Commission certify its eligibility for low-cost support from the federal universal service fund for calendar year 2018. Assurance Wireless is a competitive carrier that has been designated as an Eligible Telecommunications Carrier (“ETC”) solely for purposes of offering prepaid wireless telecommunications services supported by the Lifeline program. Its ETC designation does not entitle it to receive high-cost support from the federal universal service fund.

In 26 S.C. Code Ann. Regs. 103-690.1 the Commission specifies its annual reporting requirements for ETCs. Please find herein information responsive to those requirements.

II. COMPLIANCE WITH CTIA CONSUMER CODE FOR WIRELESS SERVICE AND OTHER SERVICE QUALITY AND CONSUMER PROTECTION RULES

The Commission requires a wireless ETC to certify that it is complying with all applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service.¹ Assurance Wireless affiliate Virgin Mobile USA, L.P. became a voluntary signatory to the Consumer Code in 2004. Since adopting the Consumer Code, Virgin Mobile and its affiliates have implemented the policies and practices required of signatories. This means that Assurance Wireless has implemented policies so that it:

- (1) Discloses rates and terms of service to consumers.
- (2) Makes available maps showing where service is generally available.
- (3) Provides contract terms to customers and confirms changes in service.
- (4) Allows a trial period for new service.
- (5) Provides specific disclosures in advertising.
- (6) Separately identifies carrier charges from taxes on billing statements.
- (7) Provides customers the right to terminate service for material changes to contract terms.

¹ 26 S.C. Code Ann. Regs. 103-690.1(B)(a), 103-690.1(B)(b)(5).

- (8) Provides ready access to customer service.
- (9) Promptly responds to consumer inquiries and complaints received from government agencies.
- (10) Abides by policies for protection of customer privacy.

Assurance Wireless certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA Consumer Code for Wireless Service. A copy of CTIA's most recent certification issued to Assurance Wireless and its affiliates is included as **Attachment 1 and Attachment 1a**. Assurance Wireless has complied and will continue to comply with the principles set forth therein.

III. ASSURANCE WIRELESS' LIFELINE REPORTING

A. Assurance Wireless' Unfulfilled Requests For Service

An ETC must make an annual report of the number of requests for service from potential customers within its service areas that were unfulfilled for the most recent calendar year.² The filing must also detail how it attempted to provide service to those potential customers. Assurance Wireless did not have any unfulfilled requests for service from qualified applicants in 2016.

B. Assurance Wireless' Complaints Per 1,000 Handsets Or Lines

The Commission requires an ETC to annually report the total number of complaints and number of complaints per 1,000 handsets or lines for the most recent calendar year.³ Assurance Wireless had 0.0845 complaints per 1,000 handsets for the 2016 calendar year.

² 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(3).

³ 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(4).

C. Assurance Wireless' Certification Regarding Emergency Functionality

The Commission requires an ETC to certify that it is able to function in emergency situations.⁴ Virgin Mobile is an affiliate of Sprint Nextel Corporation ("Sprint"), provides service using the Sprint network and certifies that it is able to remain functional in emergency situations based on FCC Rule 54.202(a)(2). Sprint has a detailed Business Continuity Program that meets this requirement. The Business Continuity Program is the framework in which Sprint sets policies for network resiliency, the development and conduct of emergency preparedness exercises and the formation of its Emergency Response Team. Attached as **Attachment 2**, please find a copy of the Sprint Business Continuity Planning Program Overview.

D. Assurance Wireless' Certification Regarding Its Provision Of A Comparable Local Usage Plan

The Commission requires an ETC to certify that it has a local usage plan comparable to the incumbent LEC in the relevant service area.⁵ Assurance Wireless's basic Lifeline service offering provides eligible customers with 350 anytime prepaid minutes, unlimited texts and 500 MB of data each month at no charge, with additional service priced at \$0.10/minute for local and long-distance calling. Assurance Wireless Lifeline customers entirely at their option can purchase blocks of additional services. Under the first option, Lifeline customers can add \$5 to their account to purchase an additional 250 monthly minutes, providing them with a total of 600 voice minutes in a month (350 free minutes plus 250 additional minutes), plus unlimited texts. Under the second option, Lifeline customers can add \$30 to their account to purchase unlimited talk, text and web. The rates for service under all plans include all applicable taxes and fees, and

⁴ 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(6)

⁵ 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(7)

customers can use their monthly minutes to place calls statewide (or even nationwide) because none of the plans imposes a local calling area requirement. Each service plan also includes voicemail, caller I.D. and call waiting services at no additional charge. Assurance Wireless also does not assess additional charges for activation or connection of Lifeline service. As a result, Lifeline customers will receive free service with no additional charges for taxes or activation. Accordingly, Assurance Wireless offers a variety of plans in South Carolina that do not have a limited calling scope. Assurance Wireless certifies that it offers a local usage plan comparable to the incumbent LEC in relevant service areas in South Carolina.

E. Assurance Wireless' Certification Regarding The Requirement To Provide Equal Access

As required by the Commission⁶, Assurance Wireless acknowledges that the Federal Communications Commission may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within one of its Service Areas.

F. Number of Lifeline Customers

The Commission requires ETCs to inform it of the number of customers receiving service in the prior year.⁷ Assurance Wireless had 23,666 customers as of December 31, 2016.

G. Copies of Responses to Lifeline Verification Survey or Certification filed with USAC

The Commission requires ETCs to file copies of responses to the Lifeline Verification Survey or Certification filed with the Universal Service Administrative Company ("USAC") on

⁶ 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(8)

⁷ 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(9)

August 31 of each year.⁸ Attached as **Attachment 3**, please find a copy of Assurance Wireless's most recent Lifeline Verification Survey or Certification filed with USAC.

IV. CONCLUSION

Assurance Wireless respectfully requests that the Commission certify the Company's eligibility to receive high-cost universal service funds in accordance with 47 C.F.R. § 54.313, and grant such other relief as is just and proper.

Respectfully submitted,

s/John J. Pringle, Jr.
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Counsel for Assurance Wireless

cc: Office of Regulatory Staff

⁸ 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(10)



Meredith Attwell Baker

August 8, 2016

Mr. Marcelo Claure
President & Chief Executive Officer
Sprint Corporation
6200 Sprint Parkway
Mailstop: KSOPHF0410-4A421
Overland Park, KS 66251

Dear Marcelo:

Congratulations! This letter is to notify you that Sprint Corporation ("Sprint") and the Sprint Prepaid Group (Virgin Mobile USA, Boost Mobile, and Assurance Wireless) have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2016 – December 31, 2016, and are deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless are authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, CTIA will provide two specimens (color and black/white) of the Seal for use on Sprint's, Virgin Mobile USA's, Boost Mobile's and Assurance Wireless' respective websites and in their respective collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Kathryn Dall'Asta, CTIA's Associate Counsel, at (202) 736-3677 or kdallasta@ctia.org.

CTIA commends Sprint for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with Sprint on this important industry initiative.

Sincerely,



Meredith Attwell Baker

cc: Charles McKee, VP Government Affairs

Attachment



SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.



Sprint Business Continuity Program Overview 2016

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Executive Summary

As businesses, government agencies, and individual consumers become more and more reliant on wireline and wireless communications, as well as remote access to information, the concept of business continuity has never been more important. Sprint incorporates business continuity as part of the corporation's overall business philosophy. This philosophy promotes utilizing business continuity principles, guidelines, and standards by all company employees during routine business operations to assure the continuation of Sprint's mission critical business operations and services. The goal of Sprint's Business Continuity (BC) program is to minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Industry accepted principles are the basis for Sprint's BC program. Sprint has adopted key principles from standards set by organizations such as the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, Federal Emergency Management Agency (FEMA), Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, International Organization for Standardization (ISO) 27001 and ISO 22301 and several Military Specifications (Mil-Spec) standards.

Sprint's Business Continuity Program Overview is reviewed and approved on an annual basis.

Sprint Business Continuity Mission Statement

Assure the continuation of Sprint's mission critical business operations and services. Minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Executive Sponsorship and Program Governance

A comprehensive business continuity program requires executive sponsorship, a structure for decision-making, and a means to direct and manage incremental changes towards goals and objectives. Sprint's program governance structure achieves each of these requirements and accomplishes them through inclusion and diversity of thought and viewpoint.

Sprint Business Continuity Program Governing Principles:

- Committed to employee and customer safety
- Committed to preserving business operations and service to Sprint customers
- Business continuity is a shared responsibility across all levels of management, all business units (BUs), the Business Continuity (BC) professionals within the BUs and the Business Continuity Office (BCO)
- Business continuity professionals and Incident Management Teams (IMTs) must be knowledgeable, well trained and prepared to respond when activated
- Continual improvement, flexibility and maturity is necessary for success

The following describes the program governance structure that begins with the highest levels of the company and leverages management and expertise for optimal effectiveness.

Executive Business Continuity Sponsors: BU senior level executive sponsors promote business continuity awareness, performance and maturity among all areas of the company. Each sponsor assigns subject matter experts and BC coordinators to make available appropriate resources to BC planning efforts for their business unit. The executive sponsors provide support to Sprint's Business Continuity Office (BCO) in overseeing BC-related

activities, performance and ensuring adherence and accountability of Sprint's BUs to BC program policies and standards.

Business Continuity Office (BCO) - The BCO is responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide BC and Disaster Recovery (DR) plans. During an incident, the BCO is responsible for coordinating cross-functional incident management activities of Sprint's Enterprise Incident Management Team (EIMT) and informing senior leadership of impacts and progress.

Business Unit Business Continuity Coordinators: BC coordinators are accountable for BU planning implementation and completion in accordance with BC program elements, as defined by the BCO, for their assigned department and executive sponsor.

Business Continuity Planners: BC planners are responsible for documenting and maintaining business continuity plans in Sprint's Business Continuity Management System (BCMS).

Proactive Governance Structure



Risk Management

Upon identification of potentially significant risks, Sprint makes every attempt to mitigate and plan for any eventuality that could affect Sprint's customers and employees. Sprint's business continuity risk program is integrated with the company's Enterprise Risk Management (ERM) process led by Corporate Audit Services (CAS) which plays a critical role in Sprint's overall success by partnering with business units to manage risk and optimize business performance. CAS has the unique opportunity to touch all facets of the company and interact with all levels of management in providing unbiased, risk-based assessments of business processes.

Risk Council: The ERM includes a Risk Council on which Managers and Directors sit. The Risk Council's purpose is:

- Risk identification
- Risk self-assessment
- Strategy and actions to address risk within policy
- Ensure compliance with ERM policies and procedures

- Provide assertions on risk exposure

Risk Steering Committee: The Risk Steering Committee is made up of Vice Presidents and Senior Vice Presidents. Their purpose is:

- Provide a strategic view of risk
- Recommendation of key risks/unforeseen events

Business Impact Analysis

Through various forms of examination, including Business Impact Analysis (BIA), criticality of every part of the business (business processes, applications, suppliers, partners, sites, network elements and other business aspects) is determined. The criticality defines how long these elements can be disrupted without significant impacts to the company's employees, customers, operations and/or assets. This prioritization drives mitigation and planning decisions. Critical business processes require a comparable criticality assigned to the applications they use, the suppliers they need and other dependencies. Sprint's classification levels for criticality include, but are not limited to, Mission Critical, Business Critical, Enhanced Support and Standard Support.

BIA reviews are conducted on a scheduled basis according to the criticality of the process, system or application. The processes, systems and applications deemed most critical are reviewed on a more frequent basis than those that are less time sensitive.

Business Continuity Strategies and Planning

Sprint uses an internally developed maturity model for benchmarking the BC program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

- Process, Standards & Documentation– Common terminology, methodologies and formal documentation on standards and procedures help our large company stay consistent and current. All key stakeholders are responsible for reviewing program documents at least annually.
- Reporting – Each year, the Business Continuity Office formally reports to Sprint's Executive Management on the efforts and status of the Business Continuity Program and partners with Corporate Audit on reporting risk information to the Board of Directors.
- Maintenance – Frequent reviews of plan details and processes are updated in a timely manner, following changes to contacts, suppliers, processes, organizational structures, etc.
- Supplier Business Continuity – Evaluation process of business continuity plans for key partners, suppliers and vendors of which Sprint is dependent upon.

Analysis of potential vulnerabilities and/or new emergent threats is completed on a regular basis. The BCO is responsible for development and implementation of enterprise strategies available to all BC Planners for use in the BC planning and maintenance processes. Examples of enterprise strategies include:

Alternate Site and Remote Access: Sprint utilizes information obtained through BIA and risk reduction strategies in order to preserve business functions that are required in the face of a disaster. Depending on the size and scale of the event, Sprint has strategies in place to provide added capacity, alternative work locations and remote access if necessary to retain operations.

Business functions that require alternate sites, geographic redundancy and remote access capabilities are identified proactively and plans are periodically reviewed and revised as necessary in anticipation of any event. As Sprint has international operations, alternate site locations vary.

Employee Continuity: Sprint has matured its former “Pandemic Continuity” Plan into “employee continuity” plans which incorporate events that may result in employee injuries or fatalities or significant and sustained employee absenteeism. Examples include a pandemic or infectious disease that poses life-threatening risks to employees and their families, a company-owned building roof collapse, or an unplanned school closing due to a natural or a man-made disaster requiring parents to be absent from the work place. Sprint has a designated internal structure responsible for impact assessments and decision making during an employee continuity event as well as proactive planning to identify emerging threats and new strategy implementation. As Sprint’s business continuity plans are developed with an “all-hazards” mindset, employee continuity strategies such as remote work, increased office cleanings and social distancing are considered in all plans.

Continuous Improvement and Maturity

In BC planning, as in other disciplines, it is important to document and test plans for effectiveness. Based on the results, updates to the plans are made. That is the basis of the **Plan-Do-Check-Act** model.

In the **Plan** phase, teams and experts analyze conditions and capabilities and devise objectives, controls, processes and systems to improve Sprint’s ability to prepare or respond to a disruption.

In the **Do** phase, teams exercise or implement the elements according to the plan(s) and ensure they operate according to assumptions/beliefs. This phase may include a test, exercise or real disruption requiring business continuity plan execution.

Exercises: Sprint’s response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Sprint conducts at minimum an annual exercise of its business continuity plan. Additionally, as part of the nation’s critical infrastructure, Sprint participates in coordinated situation drills with FEMA, the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster. The most common types of exercises conducted are tabletop, walk-through, and functional drills. The type of exercise varies as they are dependent upon needs assessments, priority, recent plan executions, budget, etc. Information related to these exercises is proprietary to Sprint.

In the **Check** phase, teams monitor and review the performance of the plans and look for opportunities for improvement. In many cases, lessons are learned from actual practices that were missed in the Plan phase. Lessons learned may be obtained from tests, exercises or real disruptions requiring business continuity plan execution.

After Action Reviews (AAR): Following an exercise or a plan execution in response to a disruption, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as lessons learned and tracked to satisfactory completion in the **Act** phase.

In the **Act** phase, changes may be necessary to the original objectives, controls, processes and systems in the original plan(s). It may be necessary to upgrade capabilities in a specific area or to change tactics or strategic assumptions. Plan(s) are then updated in accordance with lessons learned in the Do, Check and Act phases. Once plans are updated, the cycle resumes, resulting in continuous improvement.



Awareness and Training

Sprint's Business Continuity Office (BCO) is responsible for assessing business continuity awareness and training needs of the company's employees and management so that they are prepared to respond during an incident.

Awareness: On an annual basis the BCO leads a cross-departmental awareness committee whose charter is to identify appropriate opportunities to promote BC awareness and to plan and conduct campaigns and events to meet the needs of employees. The committee develops an annual BC awareness calendar at the beginning of each year with the intent to target specific, recurring events with a messaging campaign. The awareness program covers all aspects of the BC discipline and targets different audiences with specific messaging and information that is appropriate for their role in the company.

Training: Sprint's business continuity training program covers all aspects of the BC discipline and targets different audiences with specific messaging and information that is appropriate for their role in the company. Training also covers tools such as the Business Continuity Management System (BCMS) and the use of Sprint's mass notification system, for employees who have roles in incident response. Members of Sprint's Enterprise Incident Management Team (EIMT) are required to participate, at minimum annually, in enterprise training sessions facilitated by the BCO.

Additionally, an annual, all-employee policy compliance certification program includes elements of business continuity awareness and training.

Incident Management and Crisis Communications

Knowing that unexpected events occur, Sprint's Incident Management and Crisis Communications teams are highly trained and tested. As with the overall program governance structure, full executive support and authority is integrated into the incident management structure. Sprint's seasoned professionals, across multiple fields of expertise, have responded to a wide variety of major disasters.

Executive Command Team (ECT) – The Executive Command Team (ECT) is a select group of the senior leadership team with the highest level of authority for strategic and/or tactical decisions in response to an incident. The Chief Executive Officer (CEO) is the Chairperson of the ECT. During a disaster, the ECT is kept apprised of all activities and status. If the incident requires senior executive involvement, the ECT members engage to provide guidance and approval to make necessary response and recovery decisions.

Enterprise Incident Management Team (EIMT) – Chaired by the Business Continuity Office (BCO), the Enterprise Incident Management Team (EIMT) convenes quickly as a way of sharing impact, status and critical decision-making during an incident. This team is flexible and scalable and considers many different threats and hazards as well as the likelihood they will occur.

Incident Management Teams (IMTs) – An IMT consists of members of a single business unit and is designed to meet the needs of the company, customers and employees at the time of an incident. IMTs are of varying size and complexity, capable of responding quickly and effectively to a wide array of issues. Each IMT has a designated chairperson that represents their organization on the EIMT call when the incident requires an EIMT response posture.

Crisis Communications Team (CCT): During an incident, communication needs are more urgent and requiring tailoring depending on the information and the audience. Corporate Communications, Human Resources (HR) and Legal IMTs form Sprint's Crisis Communications Team (CCT). The CCT is responsible for complex and targeted internal communications to employees and/or management and for media and public relations.

Incident Management Governance



Information Technology

IT Continuity, Planning and Recovery (CPR) proactively integrates business continuity and disaster recovery methodology into every phase of IT Operations in order to facilitate rapid response and resolution to any critical business disruption. The IT CPR process is developed to minimize the incident duration and expedite and control the recovery efforts. IT CPR provides a structured approach for responding to unplanned incidents that threaten IT infrastructure, which includes hardware, software, networks, processes and people. IT CPR is responsible for business continuity planning for all IT assets located in Data Centers, Sprint owned Call Centers, Retail Stores and general office facilities.

Application Recovery Strategy: IT identifies and prioritizes the recovery of IT applications by using the Design for Criticality' (D4C) process which follows the business strategy of "Serve, Sell, Bill, Report". This criterion allows IT to assess and align each application based on the business function and impact to Sprint. An application alignment process is used to determine the priority of the application in the recovery timeline. These priorities relate to the tolerance level of the applications and systems and the length of downtime after a disaster. Recovery time objective(s) (RTO) and recovery point objective(s) (RPO) are assigned by D4C.

Data Center Resiliency Planning: Sprint Data Centers are held to exceptionally high and stringent industry standards, but more importantly, self-imposed standards of structural design, engineering, technology, redundancy, security, maintenance and 24x7 operations. Data Centers are geographically diverse and serve as alternate site failovers for each other. Strategic IT vendors critical to Sprint operations are in scope for IT Continuity, Planning and Recovery (CPR) planning solutions.

Sprint Contact Center IT Resiliency Planning: Sprint contact centers have proven failover processes. IT CPR is responsible for providing the centers with recovery planning for IT assets such as:

- Network
- Desktop

- Server
- Voice Technologies

Sprint Retail Store IT Resiliency Planning: IT CPR provides support to Retail facilities by leveraging existing Sprint strategies to ensure functionality and communications between stores and the Sprint Enterprise.

National Security & Compliance (NSC)

The NS&C team works to improve the physical and cybersecurity of Sprint's critical infrastructure and facilitates information sharing within and across the communication industry and government. Today's threat environment highlights the need to protect our Nation's critical functions that support national and economic security and public safety. A partnership leveraging public and private sector capabilities is essential for providing a realistic approach for protection and response.

The NS&C team is the primary point of contact to the Department of Homeland Security during times of increased threat or attack and during significant all hazards events. Members of the NS&C team serve as Sprint's onsite representatives at the Department of Homeland Security's National Coordinating Center (NCC) for Communications; to provide a line of communication between corporate leadership, other telecommunication providers and government officials. This partnership supports the mission of the NCC who leads emergency communications response and recovery efforts under Emergency Support Function #2 of the National Response Framework.

Network

As a Mobile Telecommunications Leader, the resiliency of Sprint's network is of paramount interest to our customers.

Network Incident Management Team: Network Services' implementation of the Incident Command System (ICS), stays true to the principles of ICS. This enables Sprint to leverage this best practice in wide-scale responses, using common terminology and standard organizational structures to communicate efficiently internally and with external customers such as Public Safety agencies as many of these agencies utilize ICS. Teams train on and deploy in standard ICS sections, branches, units and strike teams, and emphasize span of control, comprehensive resource management, and other ICS principles.

Network teams leverage Sprint tools such as hardened GPS-enabled phones, wireless modems, custom applications, M2M solutions and smart phones to aid in situation assessment, response and resource tracking. The teams also maintain a pool of Satellite phones as a contingency for use in restoration. Teams continue to create innovative response tools, such as the unique backhaul called Satellite Cell on Light Trucks (SatCOLTs) that enable restoration of service when a traditional backhaul is not available.

When the Network IMT receives notification of an actual or potential situation that requires activation (hurricane, earthquake, regional power outage, other event where business as usual would not resolve the situation), a virtual Emergency Operations Center (EOC) is established. This EOC performs an initial overall assessment, establishes monitoring bridge(s), coordinates between agencies impacted by the event, assigns tasks, gathers status information and performs executive notifications at prescribed times.

Cell Site Disaster Planning: Sprint's priority site restoration plan focuses resources and expedites recovery by making sure that existing infrastructure is operating properly under normal circumstances and by having a response plan for abnormal circumstances. To accomplish this, Sprint has implemented a detailed preventative maintenance program to insure all systems and redundant equipment are in proper working order. Sprint sites are equipped with battery backup. Some sites have fixed generators or fuel cells for additional back-up power. Sprint maintains a fleet of mobile generators deployable to Sprint service areas. Formal cell site classification designates all sites for criticality. Prioritization aids in properly allocating response personnel, generators and other resources.

Cellular Network Disaster Planning: Communications from Sprint cell sites are backhauled with various combinations of Ethernet, copper, fiber, and microwave systems. Most Sprint hub locations are placed on bi-directional fiber rings. These rings significantly reduce the chance of network failure due to third party fiber damage, equipment failures or other potential causes of service interruptions. Sprint's radio network provides significant overlapping coverage areas which often allow cell sites to fully or partially compensate for a neighboring cell site. In an effort to minimize service impact when a site is down, Sprint maintains a fleet of Cell Sites on Wheels (COWs) which are portable self-contained cell sites. COWs can be deployed to restore coverage from a damaged site or provide additional capacity in the immediate vicinity of an incident.

Switch Disaster Planning: Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at switch locations. Switch locations have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes that readily connect to the output of a portable generator in the event of primary generator issues.

Overall Network Performance Management Efforts: The performance of Sprint's networks is monitored 24 hours a day, 7 days per week and 365 days a year by the Network Monitoring Centers. In addition, local switching offices staffed by trained technicians and management coordinate with these larger operations centers, to ensure that Sprint's networks are properly maintained.

Network Restoration Prioritization: Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, TSP (Telecommunications Service Priority) and Critical Life Circuits are re-established. Sprint has an established cell site classification and service restoration process.

Special Event Planning: Special events have the potential for adversely affecting the customer experience due to greatly increased wireless traffic demands. Sprint has a mature special events process with dedicated project management personnel and a cross-functional management tool. Teams archive records of recurring special events and leverage capacity planning teams in implementing enhancements to optimize the customer experience. Sprint has used its experience in managing very large temporary users at NASCAR events to manage other special events. As an example, Sprint interfaces with the NCC (National Coordinating

Center for Communications) in managing capacity needs at National Special Security Events, NSSE.

Sprint's Emergency Response Team (ERT)

The Sprint Emergency Response Team (ERT) is the first of its kind and was created in 2002. One of the industry's largest and most advanced disaster response programs, Sprint's ERT specializes in short-term, rapidly deployable, highly mobile and self-sustaining solutions that can provide critical communication and connectivity virtually anywhere, anytime. The ERT is an experienced, cross functional group, which consists of a national team of full time, dedicated personnel as well as over a thousand of ERT Reservists across the country.

Sprint ERT's innovative Rapid Deployment Solutions* provide an easily deployable and scalable set of voice, video, mobile data, hi-speed dedicated internet access, temporary managed Wi-Fi solutions and mobile devices to government agencies, public safety, the military, first responders, K-12 and University campuses, the healthcare community and private companies during declared emergencies, field training exercises, National Special Security Events (NSSE) and short-term special events. When either an emergency or planned event happens, Sprint ERT's rapidly deployable solutions seamlessly augment existing government or corporate communication infrastructures, working hand-in-hand with an agency or corporation's personnel and allows an entity to concentrate on vital operations instead of technical issues.

Sprint's ERT provides a comprehensive response to government and corporate critical communications requirements for cellular services, including 4G LTE, as well as Satellite IP/VSAT Services. Sprint ERT's Mobile Device and Satellite Solutions:

- ERT Satellite Backhauled Cellular Voice, 4G LTE, and Satellite IP (VSAT) Solutions
 - ERT Satellite Cell on Light Trucks (SatCOLTs)
- ERT Satellite IP (VSAT) Solutions
- ERT Satellite Fly-Away-Kit (FAK)
- ERT Satellite IP Trailer
- Fixed Antenna and Customer Deployable Portable Solutions
- Multiple Contracting Options for Sprint ERT Satellite Solutions
- ERT Mobile Devices
 - ERT Go-Kits
 - ERT Rental Program
- ERT Professional Services

** ERT services, product availability and pricing are subject to change at Sprint's sole discretion. Additional terms and conditions may apply.*

Sprint ERT also offers programming, training and technical support in a variety of areas. Agencies and corporations cannot tolerate a business continuity plan with a steep learning curve; it must work the first time an emergency tests it. Sprint's ERT enables an agency or corporation to rest easily, knowing their solution is built with a robust, reliable, and tested program design where tasks are performed by Sprint ERT to avoid straining the agency or corporation's resources.

Sprint's Commitment to Public Safety through EOC Partnerships:

Sprint is dedicated to maintaining contact with key Emergency Operations Centers (EOC) during major disasters and special security events. A process is in place for Sprint to support and communicate with state and county EOC's to help facilitate situational awareness.

Benefits of the EOC Information Sharing Partnership

- Sprint can respond to the EOC's needs for recovery information and information sharing to facilitate situational awareness.
- Obtaining critical information from the EOC that will aid Sprint in its recovery and restoral process (e.g. curfews or road closures for field restoration crews or generator deployment).
- Making key contacts within the EOC (EOC lead, utility representatives, other ESFs).
- Communicating EOC priority areas for recovery back to Sprint.

Value of Sprint's EOC Staffing Strategy for Public Safety:

- Sprint is able to provide information and status updates to the EOCs on pertinent network recovery efforts.
- The State EOC can provide direction on where *their* priority disaster areas are for Sprint to restore the network.
- Sprint can obtain information from the other Emergency Support Functions such as ESF-12; Energy/Power that helps determine where to deploy our network recovery assets.
- Proper credentials that allow our network technicians to pass through area access points that are otherwise restricted to the public.
- Obtain locations of FEMA and other emergency responder command posts, to help Sprint plan for the influx of users/increase network capacity needs.
- Overall, it is a way for Sprint to be proactive, not reactive, in the response and recovery efforts that may impact our communities.

Contact Sprint's ERT: For more information on Sprint's Emergency Response Team, please visit us at:

- www.sprint.com/ert
- Become a fan on Facebook at www.facebook.com/SprintEmergencyResponseTeam
- Email us at ERTRequests@sprint.com
- Or contact our 24x7x365 ERT Hotline at 1-888-639-0020 (GETS users call 254-295-2220)

Annual Lifeline Eligible Telecommunications Carrier Certification Form

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

249013	143033426
Study Area Code (SAC) <i>(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).</i>	Service Provider Identification Number (SPIN)
2016 SC	Virgin Mobile USA LP
Recertification Year State	ETC Name
Assurance Wireless	Sprint Corporation
DBA, Marketing, or Other Branding Name <i>(If same as ETC name, list "N/A" Do not leave blank)</i>	Holding Company Name <i>(If same as ETC name, list "N/A" Do not leave blank)</i>

Does the reporting company have affiliated ETCs?

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Section 1: Initial Certification *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial JMF

Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year <i>(February data month)</i>	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year <i>(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)</i>	Number of subscribers de-enrolled prior to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
34781	0	3670	7616	23495

Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible <i>(This should be a subset of Block G.)</i>	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
24266	22268	1998	218	2216

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

- A) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial JMF

AND/OR

- B) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: _____ *(List database or name of administrator here)* Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

OR

- C) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$M = (F+K)$	$N = (J+L)$	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
24266	2216	9.13%

Section 4: ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements? Yes ☒ No ☐

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	9
April	1
May	5
June	2
July	4
August	475
September	656
October	247
November	492
December	454
Total Subscribers	2345

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Certified Online

Signature of Officer

Jay.M.Franklin@sprint.com

Email Address of Officer

Andy M. Lancaster

Person Completing This Certification Form

Jay M. Franklin, Assistant
Controller

Printed Name and Title of Officer

01/31/2017

Date

913-762-6107

Contact Phone Number